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Attorneys For: Defendant,  
*I.Q. Data International, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BELINDA MARIE BALL-LIVINGSTON, an  
individual; and BREANNA MARIE BALL, an  
individual,

Plaintiff,

vs.

I.Q. DATA INTERNATIONAL, INC., a Foreign  
corporation,

Defendants.

CASE NO. 2:22-cv-00596-JAD-VCF

**DEFENDANT I.Q. DATA  
INTERNATIONAL, INC.'S  
UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO  
ANSWER OR OTHERWISE  
PLEAD**

**DEFENDANT I.Q. DATA INTERNATIONAL, INC.'S UNOPPOSED MOTION FOR  
AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant I.Q. Data International, Inc. ("IQD"), by and through its attorneys of Gordon Rees Scully Mansukhani, LLP, respectfully moves for an unopposed extension of time to file its answer or otherwise responsive pleading to Plaintiff's Complaint. In support, IQD states as follows:

1. On April 8, 2022, Plaintiff filed a Complaint against IQD, generally alleging that IQD violated the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* ("FDCPA").
2. IQD's current deadline to file its response to the Complaint is July 8, 2022.
3. The Parties have been attempting to engage in early informal settlement

discussions. Those discussions have not been exhausted.

4. June 30, 2022, Plaintiff provide her most recent settlement demand, and Defendant has not yet been able to respond in light of the July 4<sup>th</sup> Holiday.

5. On July 7, 2022, Defense Counsel for IQD contacted Plaintiff's counsel, who subsequently agreed to provide IQD with an extension of time through and including August 5, 2022, in which to answer or otherwise plead.

6. IQD expects that a 28-day extension in which to answer or otherwise plead will be sufficient to exhaust settlement discussions and respond to the Complaint, if necessary.

7. This motion is not brought to unduly delay these proceedings or to harass any party to this case.


WHEREFORE, IQD respectfully requests this Honorable Court grant it an extension of time, up to and including August 5, 2022, to file its responsive pleading to Plaintiff's Complaint, in the absence of any opposition and because good cause exists.

Dated: July 18, 2022

GORDON REES SCULLY MANSUKHANI,  
LLP

By: s/Sean P. Flynn  
Sean P. Flynn (SBN: 15408)  
Attorneys for Defendant  
I.Q. DATA INTERNATIONAL, INC.

IT IS SO ORDERED.

  
\_\_\_\_\_  
Cam Ferenbach  
United States Magistrate Judge  
7-19-2022  
DATED \_\_\_\_\_

Gordon Rees Scully Mansukhani, LLP  
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